



The New York Times  
Company

David McCraw  
Vice President &  
Deputy General Counsel

T 212 556 4031

mccraw@nytimes.com

620 8th Avenue  
New York, NY 10018  
nytimes.com

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**VIA FEDERAL EXPRESS**

The Honorable Brian M. Cogan  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

RECEIVED  
HON. Brian M. Cogan  
JUN 10 2019

Re: United States v. Beltran-Levy, et al., 09-cr-466 – Unsealing of Records

Dear Judge Cogan:

I write on behalf of The New York Times Company (“The Times”) regarding sealed judicial records in Joaquín Guzmán Loera’s above-referenced criminal case. Over the past two months, the parties have agreed that certain documents can be unsealed. We write to ask that the Court now unseal those records.

*First*, in a joint letter to the Court on April 5, 2019, the parties consented to the release of docket items 420, 477, and 528 with limited redactions. *See* Dkt. 601 at 1.<sup>1</sup> Though the Court’s subsequent order addressed these docket items, *see* Dkt. 603 ¶¶ 5, 7, they remain inaccessible on the public docket. The Times asks that they be publicly released.

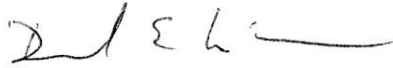
*Second*, in a separate letter filed with the Court on May 5, 2019, the parties addressed the continued sealing of numerous other records. *See* Dkt. 610. The parties agreed on the need to seal (or unseal) some records but disagreed on others. The Times is sensitive to the Court’s workload and appreciates that resolving the sealing disputes may take some time. In the interim, however, The Times respectfully requests that the Court order the unsealing of records that the parties have agreed can be released: 45 (partially), 124, 126, 174, 175, 230, 256, 263 (not exhibits), 276 (not exhibits), 283, 286, 307, 311, and 334.

We thank the Court for its consideration.

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<sup>1</sup> The parties also consented to the release of docket item 484, but it appears that document has already been made public. *See* Dkt. 587-6.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D E McCraw", with a long horizontal flourish extending to the right.

David E. McCraw

cc: All counsel of record (via e-mail)